

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MARYLAND SHALL ISSUE, INC., et al.;)
Plaintiffs,)
v.)
LAWRENCE HOGAN, et al.;)
Defendants.)

Case No.: 16-cv-3311-ELH

DECLARATION OF STEPHEN SCHNEIDER

I, Stephen Schneider, under penalty of perjury, declare and state as follows:

1. I am more than 18 years of age and am competent to testify, upon personal knowledge, to the matters stated below.
2. I am the owner and president of Atlantic Guns, Inc. ("Atlantic Guns"). Atlantic Guns is a family-owned firearms retailer founded in 1950 by my father.
3. Atlantic Guns is a licensed Maryland regulated firearms dealer, and it buys, sells, receives, and transfers firearms including handguns within and without Maryland.
4. Atlantic Guns has two locations. One in Rockville, Maryland, and one in Silver Spring, Maryland.
5. Atlantic Guns' customers and prospective customers are law-abiding, responsible Maryland citizens who wish to possess handguns for self-defense in their homes but are deterred from doing so by Maryland's Handgun License requirement.

6. Handguns are the most popular choice of Atlantic Guns' customers for self-defense in the home.

7. Atlantic Guns' business has been severely impacted by the passage of Maryland's Handgun License requirement because it is barred by law from providing handguns to customers who do not have a Handgun License.

8. Atlantic Guns turns away would be customers every week for this reason, totaling at least in the hundreds over the five years since the Handgun License requirement took effect. Sometimes prospective customer place a deposit on a handgun, which we then hold pending their obtaining a Handgun License. Some of these customers later request refunds and the sale is not consummated.

9. Since the Handgun License took effect in Maryland, Atlantic Guns has sold significantly fewer handguns per year. According to the Maryland State Police records, comparing the four years prior to the Handgun License enactment in 2013 (2009–2012) to the four years following (2014–2017), Atlantic Guns lost approximately [REDACTED] of its prior handgun sales after the Handgun License requirement was imposed. Exhibit A. Atlantic Guns' gross revenues from handgun sales have also decreased by [REDACTED] since the Handgun License requirement took effect. Exhibit B.

10. Additionally, the average cost of a new handgun in Maryland is between approximately \$500 and \$600.

I declare and affirm under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.


Stephen Schneider

10/3/18
Date

CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2018, I electronically filed the foregoing with the Clerk of the Court of the United States District Court for the District of Maryland by using the CM/ECF system, which will provide service to all counsel of record, who are registered CM/ECF users.

Respectfully submitted,

/s/ John Parker Sweeney

John Parker Sweeney

Counsel for Plaintiffs